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May 27, 2004

VIA HAND DELIVERY

Honorable Deborah Taylor Tate, Chairman
c/o Sharla Dillon, Docket & Records Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

**RE: Tennessee Coalition of Rural Incumbent Telephone Companies and
Cooperatives Request for Suspension of Wireline to Wireless Number
Portability Obligations Pursuant to Section 251(f)(2) of the
Communications Act of 1934, as Amended
TRA Docket # 03-00633**

Dear Chairman Tate:

Pursuant to the Procedural Schedule in the above-captioned matter, enclosed please find an original and fourteen (14) copies of Verizon Wireless' Responses to the Coalition's First Set of Discovery Requests to Verizon Wireless.

Please "File Stamp" the additional copy of the above-referenced document for our records. If you have any questions or require additional information, please let me know

Respectfully,


Melvin J. Malone

MJM/cgb
Enclosures

cc: Parties of Record
Edward Phillips (Courtesy Copy)

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

IN RE:)	
)	
TENNESSEE COALITION OF RURAL)	Docket No. 03-00633
INCUMBENT TELEPHONE)	
COMPANIES AND COOPERATIVES)	
REQUEST FOR SUSPENSION)	
OF WIRELESS TO WIRELESS)	
NUMBER PORTABILITY)	
OBLIGATIONS PURSUANT TO)	
SECTION 251(f)(2) OF THE)	
COMMUNICATIONS ACT OF 1994, AS)	
AMENDED)	
)	

**RESPONSE OF CELCO PARTNERSHIP D/B/A VERIZON WIRELESS
TO THE COALITION'S FIRST SET OF DISCOVERY REQUESTS
TO VERIZON WIRELESS**

Cellco Partnership, d/b/a Verizon Wireless on behalf of itself and its affiliates operating in Tennessee ("Verizon Wireless"), hereby responds to the Discovery Requests submitted by the Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives (the "Coalition").

GENERAL OBJECTIONS

Verizon Wireless objects to all interrogatories and requests for production involving documents or data from jurisdictions other than Tennessee. Such documents or data have no application to the present dispute, are irrelevant to a determination of the issues raised in this proceeding, and will not lead to relevant discovery. Therefore, in responding to interrogatories and requests for production, Verizon Wireless will presume that all data and documents requests involve only activities occurring in Tennessee

Verizon Wireless further objects to all interrogatories and requests for production involving documents that are (1) subject to the attorney-client privilege, (2) attorney work-product, or (2) prepared in anticipation of litigation.

Without waiving any of the above objections, Verizon Wireless responds as follows:

DISCOVERY REQUESTS

1. Please list since January 1, 1997 to the present the number of requests Verizon Wireless has received for numbers to be ported to Verizon Wireless from a wireline number of a customer served by any member of the Coalition. For *each* request, please list the company and exchange for the number that has requested porting, the telephone number associated with that request, and the date of the porting request.

RESPONSE: Verizon Wireless objects to this request on the grounds that it is overly broad, unduly burdensome, irrelevant, and immaterial. The request covers a period not reasonably calculated to lead to the discovery of relevant, material, and admissible evidence. Moreover, the requested information is both irrelevant and immaterial to the obligation of Coalition members to timely implement intermodal number portability and to the resolution of the suspension requests. The requested information does not have the tendency to make the existence of any material fact more probable or less probable than it would be without the evidence. Under the Telecommunications Act of 1996 and the Federal Communications Commission's ("FCC") rules and orders, the Coalition has the evidentiary burden in this matter, not any opposing party. Verizon Wireless also objects to this request on the grounds that it does

not maintain the information requested in the ordinary course of its business. Without waiving its objections, Verizon Wireless responds as follows.

The FCC extended the implementation deadline for intermodal number portability in areas served by the members of the Coalition until May 24, 2004. As Verizon Wireless does not maintain the requested information regarding port requests in the ordinary course of business, compiling this information, even if possible, would be unduly burdensome. Once intermodal porting begins in areas served by members of the Coalition, Verizon Wireless will capture and data on porting volumes but not on a carrier-specific basis for all carriers or on a customer-specific basis.

2. Please provide a copy of each request from Verizon Wireless to a Coalition member for local number portability. Please state whether you consider any of these requests to be “bona fide” and please provide all factual and legal reasons supporting your position.

RESPONSE: Verizon Wireless objects to the request for production on the grounds that the information requested is obtainable from a more convenient, less burdensome, and less expensive source, as the information is in the possession or control of the respective Coalition members. If a Coalition member represents that it is unable, after a reasonable attempt, to locate the requested information, Verizon Wireless will produce the requested information.

It is Verizon Wireless’ position that each request from Verizon Wireless to a Coalition member for local number portability is a “bona fide” request, as the requests comply with applicable FCC criteria. Moreover, based on information obtained from the

Local Exchange Routing Guide (“LERG”), Verizon Wireless provided specific information regarding the targeted rate center, NPA-NXX codes, and the switch CLLI of switches in its licensed service areas that were not marked in the LERG as LNP capable.

3. Please state whether Verizon Wireless can comply with porting requests and provide service for customers within all areas serviced by the Coalition. If there are any areas where Verizon Wireless cannot accept porting requests and provide service within this area, please specify the exchange and the Coalition member that serves that location.

RESPONSE: Verizon Wireless can comply with porting requests and provide service to customers within areas serviced by seventeen (17) members of the Coalition. In its Opposition to Suspension Request and Petition for Leave to Intervene, Verizon Wireless noted that it had submitted bona fide requests to approximately seventeen (17) of the twenty (20) members of the Coalition. Verizon Wireless has overlapping coverage with those Coalition members to whom it has submitted a bona fide request and expects to be able to provide portability to customers served by these carriers, or will notify customers at the point of sale of any service differences.

4. Is Verizon Wireless willing to be responsible for the costs to transport calls to a ported number where Verizon Wireless has no physical point of interconnection on the Coalition’s network?

RESPONSE: Verizon Wireless will be responsible for transport costs pursuant to any applicable state or federal laws or as otherwise negotiated among carriers in transiting agreements.

5. Please state your position on how calls to a ported number should be routed by the Coalition member.

RESPONSE: In its November 10, 2004, Intermodal Porting Order, the FCC unequivocally determined that wireless carriers need not enter into Section 251 interconnection agreements with wireline carriers solely for the purpose of porting numbers. The FCC concluded that the obligations of wireless carriers regarding intermodal porting could be discharged with a “minimal” exchange of information. The FCC concluded that wireline carriers may not unilaterally require interconnection agreements prior to intermodal porting. According to the FCC’s above-referenced Order, number portability, by itself, does not create new obligations with regard to exchange of traffic between the carriers involved in the port.

Also in its November 10, 2004, Intermodal Porting Order, the FCC’s concluded that porting from a wireline to a wireless carrier that does not have a point of interconnection or numbering resources in the same rate center as the ported number does not, in and of itself, constitute location portability, because the rating of calls to the ported number stays the same. According to the FCC’s Order, since a wireless carrier porting-in a wireline number is required to maintain the number’s original rate center designation following the port, calls to the ported number will continue to be rated in the same fashion as they were prior to the port.

6. Please confirm that Verizon Wireless does not dispute the costs set forth by each Coalition member in the Amended Petition on pages 10-14. If Verizon Wireless' response is anything but an unqualified confirmation, please provide the legal and factual basis for the response.

RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product and/or was prepared in anticipation of litigation or for hearing. Without waiving this objection, Verizon Wireless responds as follows.

As presented, the "estimated" costs set forth by each Coalition member in the Amended Petition on pages 10-14 are not supported by any underlying documentation. Moreover, certain of the costs set forth in the Amended Petition on pages 10-14 are either merely estimates or have, by the language of the Amended Petition, not been quantified. Given the form and manner in which the costs set forth by each Coalition member in the Amended Petition are presented, Verizon Wireless is unable to confirm that it does not dispute the costs set forth by each Coalition member in the Amended Petition on pages 10-14. Also, given the form and manner in which the costs set forth by each Coalition member in the Amended Petition on pages 10-14 are presented, Verizon Wireless is unable to provide the basis for its position on the costs set forth by each Coalition member in the Amended Petition on pages 10-14.

7. Please confirm that Verizon Wireless does not dispute the dates of in-office LNP technical, hardware, or software deployment, as provided in Attachment A to

the Coalitions' Amended Petition. If Verizon Wireless' response is anything but an unqualified confirmation, please provide the legal and factual basis for the response.

RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product and/or was prepared in anticipation of litigation or for hearing. Without waiving this objection, Verizon Wireless responds as follows.

Given the form and manner in which the dates of in-office LNP technical, hardware, or software deployment, as provided in Attachment A to the Coalitions' Amended Petition, are presented, Verizon Wireless is unable to confirm that it does not dispute the dates of in-office LNP technical, hardware, or software deployment, as provided in Attachment A to the Coalitions' Amended Petition. Also, given the form and manner in which the dates of in-office LNP technical, hardware, or software deployment, as provided in Attachment A to the Coalitions' Amended Petition, are presented, Verizon Wireless is unable to provide the basis for its position on the dates of in-office LNP technical, hardware, or software deployment, as provided in Attachment A to the Coalitions' Amended Petition.

8. Identify each person whom you expect to call as an expert witness at any hearing in this docket, and for each such expert witness:

RESPONSE:

Verizon Wireless has not completed its preparations for the hearing in this matter. Therefore, subject to change, at this time Verizon Wireless expects to call William Christopher ("Chris") Jones and Gregory Curtis ("Greg") Cole.

Responses to Requests 8(a)-(h) - William Christopher ("Chris") Jones.

(a) identify the field in which the witness is to be offered as an expert;

RESPONSE:

Mr. Jones is employed by Verizon Wireless as Associate Director of State and Area Public Policy for Southeastern Region. Mr. Jones will testify primarily regarding regulatory and policy issues related to number portability.

(b) provide complete background information, including the expert's current employer as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify, and identify all publications written or presentations presented in whole or in part by the witness;

RESPONSE: Verizon Wireless objects to that portion of this request asking Verizon Wireless to identify all publications written or presentations presented in whole or in part by the witness on the grounds that said portion of this request is overly broad and unduly burdensome. Further, said portion of this request is not tailored to the issues that are relevant and material to this matter, to Mr. Jones' role as Associate Director of State and Area Public Policy for Southeastern Region for Verizon Wireless, or to the area of telecommunications and is not reasonably calculated to lead to the discovery of relevant, material, and admissible evidence. Consistent with its objections, Verizon Wireless responds as follows.

William Christopher (Chris) Jones' business address is One Verizon Place, Mail Code: GA1B31GL, Alpharetta, Georgia 30004. Mr. Jones is employed by Verizon Wireless as Associate Director of State and Area Public Policy for Southeastern Region. Mr. Jones joined Verizon Wireless in July 2000 as part of the Bell Atlantic-GTE merger, and he is responsible for Verizon Wireless' participation in state legislative and regulatory agencies for the eight (8) southeastern states of Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina and Tennessee. From June 1996 to July 2000, Mr. Jones served as Manager-Legislative Matters for GTE Wireless and had responsibility for state and congressional affairs in 22 states. Before joining GTE Wireless, Mr. Jones worked in various external affairs jobs for GTE Service Corporation in Irving, Texas and Washington, D. C. from 1989 until June 1996. From 1982 to 1989, Mr. Jones worked in various public affairs assignments for GTE Telephone Operations in Erie, Pennsylvania and in Moultrie and Dalton, Georgia. Mr. Jones has a journalism degree from the University of Georgia, which he received in 1973.

To the best of his recollection, following are the publications written or presentations presented in whole or in part by Mr. Jones relating to his qualifications as a witness in this matter or relating to number portability: Mr. Jones publicly presented CTIA's Consumer Code for Wireless Carriers to the Tennessee Regulatory Authority in 2003.

Mr. Jones has been involved in many oral discussions/presentations with various state commissions and various state legislatures on a host of telecommunications issues, including number portability.

Should it become necessary for Verizon Wireless to supplement this response, Verizon Wireless will act accordingly

(c) provide the grounds (including without limitation any factual bases) for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;

RESPONSE: The Telecommunications Act of 1996, and FCC orders and rules relating to number portability. In sum, Mr. Jones will primarily testify that in reliance upon the Telecommunications Act of 1996 the FCC considered number portability to be of considerable benefit to consumers and in the public interest. In its orders and rules relating to number portability, the FCC considered the issues before the Authority in this matter and timely determined and reaffirmed that the benefits to consumers and the public interest both compel a steady course towards intermodal portability. Verizon Wireless provides services throughout Tennessee. Verizon Wireless has, consistent with FCC criteria, submitted bona fide requests to at least seventeen (17) members of the Coalition. The foregoing, in summary, will provide the background from which Mr. Jones will testify that the suspension/waiver requests, from a regulatory and policy standpoint, are unwarranted.

Verizon Wireless objects to responding further to this request on the grounds that it is unreasonably cumulative or duplicative and is obtainable from the soon to be submitted Pre-filed testimony.

(d) identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;

RESPONSE: Verizon Wireless objects to this request on the grounds that it is overly broad and unduly burdensome. This request is not tailored to the issues relevant and material to this matter, to Mr. Jones' role as Associate Director of State and Area Public Policy for Southeastern Region for Verizon Wireless, or to the area of telecommunications and is not reasonably calculated to lead to the discovery of relevant, material,

and admissible evidence. Without waiving its objections, Verizon Wireless responds as follows.

To the best of his recollection, Mr. Jones has presented testimony before the following state utility/public service commissions: Alabama, California, the District of Columbia, Florida, Georgia, Indiana, Kentucky, Maryland, North Carolina, South Carolina, and Texas. To the best of Mr. Jones' recollection, the testimony in Georgia occurred in 2002 and related to numbering issues and the testimony in Maryland occurred in either 2002 or 2003 and related to 911 issues.

While not formal testimony in the context of a hearing, Mr. Jones did publicly present the CTIA's Consumer Code for Wireless Carriers before the Tennessee Regulatory Authority in 2003.

To the best of his recollection, Mr. Jones has presented comments/testimony before the following state legislative bodies: Alabama, Florida, Georgia, South Carolina, and Tennessee. With respect to his comments/testimony before legislative bodies, Verizon Wireless objects to the request to identify dates, subject matter, and the transcript on the grounds that such requests are over broad, unduly burdensome, and expensive and is not reasonably calculated to lead to the discovery of relevant, material, and admissible evidence

During the time in which this response was prepared, Mr. Jones was out of the office. Should it become necessary for Verizon Wireless to supplement this response, Verizon Wireless will act accordingly.

(e) identify for each such expert any person whom the expert consulted or otherwise communicated with in connection with his expected testimony;

RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product and/or is subject to the attorney-client privilege. Without waiving its objections to this request, Verizon Wireless responds as follows.

Chris Jones has not begun preparing testimony in this matter. It is expected that Mr. Jones may consult or otherwise communicate with Greg Cole, should Mr. Cole testify.

(f) identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;

RESPONSE: Mr. Jones is employed by Verizon Wireless as Associate Director of State and Area Public Policy for Southeastern Region.

(g) identify all documents or things shown to, delivered to, received from, relied upon, or prepared by any expert witness, which are related to the witness(es)' expected testimony in this case, whether or not such documents are supportive of such testimony, including without limitation all documents or things provided to that expert for review in connection with testimony and opinions; and

RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product and/or is subject to the attorney-client privilege. Without waiving its objections, Verizon Wireless responds as follows.

Verizon Wireless has not completed its preparations for the hearing in this matter. At this time, the following are responsive: the FCC's notices, orders and rules relating to number portability, the bona fide requests submitted by Verizon Wireless to seventeen (17) members of the Coalition and the Amended Petition and discovery responses provided by members of the Coalition.

The following is a representative list of FCC decisions responsive to this request. Given that all FCC notices, orders and rules relating to number portability are publicly available, this list is not meant to be exhaustive, only representative.

- Verizon Wireless's Petition for Partial Forbearance from the Commercial Mobile Radio Services Number Portability Obligation, *Memorandum Opinion and Order*, 17 FCC Rcd. 14972 (2002) ("*VZW Forbearance Order*")
- Telephone Number Portability, *Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, 18 FCC Rcd. 23697 (2003) ("*Intermodal Porting Order*")
- Telephone Number Portability, *Order*, 19 FCC Rcd. 875, ¶1 (2004) ("*Two Percent Carrier Order*")
- Telephone Number Portability, *First Report and Order and Further Notice of Proposed Rulemaking*, 11 FCC Rcd. 8352 (1996) ("*First Report and Order*")
- Telephone Number Portability, *Second Report and Order*, 12 FCC Rcd 12281 (1997) ("*LNP Second Report and Order*")
- Telephone Number Portability, *Third Report and Order*, 13 FCC Rcd 11701 (1998) ("*LNP Third Report and Order*").
- Telephone Number Portability, Petition of the North-Eastern Pennsylvania Telephone Company for Temporary Waiver of its Porting Obligations, *Order*, CC Docket No. 95-116, DA 04-1312 (rel. May 13, 2004)

- Wireless Telecommunications Bureau and Wireline Competition Bureau Remind Carriers Outside the 100 Largest MSAs of the Upcoming May 24, 2004 Local Number Portability Implementation Deadline, *Public Notice*, DA 04-1340 (rel. May 13, 2004)
- CenturyTel, Inc., CenturyTel of Washington, Inc., CenturyTel of Cowiche, Inc., and CenturyTel of Inter Island, Inc., *Notice of Apparent Liability for Forfeiture*, File No. EB-04-IH-0012 (rel. May 13, 2004)

(h) identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert.

RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product. Without waiving its objections, Verizon Wireless responds as follows.

Verizon Wireless has not completed its preparations for the hearing in this matter. If it becomes necessary to supplement this response at a later time, Verizon Wireless will act accordingly.

Responses to Requests 8(a)-(h) – Gregory Curtis (“Greg”) Cole.

(a) identify the field in which the witness is to be offered as an expert;

RESPONSE:

Greg Cole is employed by Verizon Wireless as the Network Transport Planning Manager for the South Area.

(b) provide complete background information, including the expert’s current employer as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify, and identify all publications written or presentations presented in whole or in part by the witness;

RESPONSE: Verizon Wireless objects to that portion of the request asking Verizon Wireless to identify all publications written or presentations presented in whole or in part by the witness on the grounds that said portion of the request is overly broad and unduly burdensome. Further, said portion of this request is not tailored to the issues that are relevant and material to this matter, to Mr. Cole’s role as the Network Transport Planning Manager for the South Area for Verizon Wireless, or to the area of telecommunications and is not reasonably calculated to lead to the discovery of relevant, material, and admissible evidence.

Greg Cole's business address is 8921 Research Drive, Charlotte, North Carolina 28262. Mr. Cole is employed by Verizon Wireless as the Network Transport Planning Manager for the South Area. Mr. Cole joined Verizon Wireless in April 2000 as part of the Bell Atlantic-Vodafone/AirTouch Cellular merger, and he is responsible for transport planning and phone number administration for thirteen (13) states, which includes Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, and Texas. From December 1994 to April 2000, Mr. Cole served as a network systems engineer for AirTouch Cellular and had responsibility for the transport design of the Atlanta Georgia market. Before joining AirTouch Cellular, Mr. Cole served as systems engineer with Communications International, Inc. in Norcross, Georgia from 1990 until October 1992. From October 1992 to May 1993, Mr. Cole worked as a contract engineer with Scientific Atlanta in Norcross GA. From May 1993 to October 1994, Mr. Cole served as the engineering manager for Communications International, Inc. Mr. Cole has an electrical engineering technology degree from the Southern College of Technology, which he received in 1990.

Consistent with the above objections, Verizon Wireless responds that at this time, it has not been able to identify any publications written or presentations presented in whole or in part by Mr. Cole relating to his qualifications as a witness in this matter. Mr. Cole did participate on a conference call relating to reverse toll billing with the Kentucky Public Service Commission. To the best of his recollection, said conference call occurred either in the 4th quarter of 2002 or the 1st quarter of 2003. If it becomes necessary to supplement this response at a later time, Verizon Wireless will act accordingly.

(c) provide the grounds (including without limitation any factual bases) for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;

RESPONSE: The Telecommunications Act of 1996, FCC notices, orders and rules relating to number portability and interconnection. Moreover, Mr. Coles' familiarity with Verizon Wireless' network, including its efforts to become LNP capable, and various interconnection issues arising from the scope of his employment will also provide the grounds for his expected testimony.

Verizon Wireless objects to responding further to this request on the grounds that it is unreasonably cumulative or duplicative and is obtainable from the soon to be submitted Pre-filed testimony.

(d) identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and

forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;

RESPONSE: Verizon Wireless objects to this request on the grounds that it is overly broad and unduly burdensome. This request is not tailored to the issues relevant and material to this matter, to Mr. Coles' role as the Network Transport Planning Manager for the South Area for Verizon Wireless, or to the area of telecommunications and is not reasonably calculated to lead to the discovery of relevant, material, and admissible evidence. Without waiving its objections, Verizon Wireless responds as follows.

To the best of his recollection, Mr. Cole has not previously presented testimony. If it becomes necessary for Verizon Wireless to supplement this response, Verizon Wireless will act accordingly.

(e) identify for each such expert any person whom the expert consulted or otherwise communicated with in connection with his expected testimony;

RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product and/or is subject to the attorney-client privilege. Without waiving its objections to this request, Verizon Wireless responds as follows.

Greg Cole has not begun preparing testimony in this matter. It is expected that Mr. Cole may consult or otherwise communicate with Chris Jones in this matter.

(f) identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;

RESPONSE: Greg Cole is employed by Verizon Wireless as the Network Transport Planning Manager for the South Area.

(g) identify all documents or things shown to, delivered to, received from, relied upon, or prepared by any expert witness, which are related to the witness(es)' expected testimony in this case, whether or not such documents are supportive of such testimony, including without limitation all documents or things provided to that expert for review in connection with testimony and opinions; and

RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product and/or is subject to the attorney-client privilege. Without waiving its objections, Verizon Wireless responds as follows.

Verizon Wireless has not completed its preparations for the hearing in this matter. However, see response to item 8(g) provided for Mr. Jones.

(h) identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert.

RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product. Without waiving its objections, Verizon Wireless responds as follows.

Verizon Wireless has not completed its preparations for the hearing in this matter. If it becomes necessary to supplement this response at a later time, Verizon Wireless will act accordingly.

9. Please produce copies of any and all documents referred to or relied upon in responding to the Coalition's discovery requests.

RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product and/or is subject to the attorney-client privilege. To the extent this request seeks documents prepared in anticipation of litigation or for hearing and not generally discoverable, Verizon Wireless objects to this request on the grounds that the requesting party has not demonstrated a substantial need of the materials in the preparation of the case. Further, under the Telecommunications Act of 1996 and the FCC's rules and orders, the Coalition has the evidentiary burden in this matter, not any opposing party. Without waiving the foregoing objections, Verizon Wireless responds as follows.

The following are responsive to this request: various FCC notices, orders, rules, and the like related to number portability and interconnection, the Telecommunications Act of 1996, Verizon Wireless' bona fide requests to Coalition members, and CTIA's Consumer Code for Wireless Carriers.

With respect to the foregoing response, Verizon Wireless objects to this request for production on the grounds that such information is obtainable from a more convenient and less burdensome source. The CTIA's Consumer Code for Wireless Carriers is available at www.ctia.org.

See also Verizon Wireless' responses to Request Nos. 2 and 8(g).

10. Please provide all material provided to, reviewed by or produced by any expert or consultant retained by Verizon Wireless to testify or to provide information from which another expert will testify concerning this case.

RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product and/or is subject to the attorney-client privilege. Without waiving its objections, Verizon Wireless responds as follows.

At this time, Verizon Wireless has not and does not intend to retain an expert or consultant in this matter. If Verizon Wireless later determines to retain an expert, it will supplement this response accordingly.

11. Please produce all work papers of any of Verizon Wireless' proposed experts, including but not limited to file notes, chart notes, tests, test results, interview and/or consult notes and all other file documentation that any of Verizon Wireless' expert witnesses in any way used, created, generated or consulted by any of Verizon Wireless' expert witnesses in connection with the evaluation, conclusions and opinion in the captioned matter.

RESPONSE: Verizon Wireless objects to this request on the grounds that it is overly broad and unduly burdensome. Without waiving this objection, Verizon Wireless responds as follows.

Verizon Wireless has not completed its preparations for the hearing in this matter. At this time, there are no documents responsive to this request. If it becomes necessary to supplement this response at a later time, Verizon Wireless will act accordingly.

12. Please produce a copy of all trade articles, journals, treatises and publications of any kind in any way utilized or relied upon by any of Verizon Wireless' proposed expert witnesses in evaluating, reaching conclusions or formulating an opinion in the captioned matter.

RESPONSE: Verizon Wireless has not completed its preparations for the hearing in this matter. At this time, there are no documents responsive to this request. If it becomes necessary to supplement this response at a later time, Verizon Wireless will act accordingly.

13. Please produce a copy of all documents which relate or pertain to any factual information provided to, gathered by, utilized or relied upon by any of Verizon Wireless' proposed expert witnesses in evaluating, reaching conclusions or formulating an opinion in the captioned matter.

RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product and/or is subject to the attorney-client privilege. Verizon Wireless further objects to this request on the grounds that it is overly broad and unduly burdensome. Without waiving the foregoing objections, Verizon Wireless responds as follows.

The following are responsive to this request: various FCC notices, orders, rules, and the like related to number portability and interconnection, the Telecommunications Act of 1996, and Verizon Wireless' bona fide requests to Coalition members. With respect to the foregoing response, Verizon Wireless objects to this request for production on the grounds that such information is obtainable from a more convenient and less burdensome source.

See also Verizon Wireless' responses to Request Nos. 2, 8(g), and 9.

14. Please produce a copy of all articles, journals, books or speeches written by or co-written by any of Verizon Wireless' expert witnesses, whether published or not.

RESPONSE: Verizon Wireless objects to this request on the grounds that it is overly broad and unduly burdensome. Further, this request is not tailored to the issues relevant and material to this matter, to the witness's respective roles at Verizon Wireless, or to the area of telecommunications and is not reasonably calculated to lead to the discovery of relevant, material, and admissible evidence. With respect to any published items requested, Verizon Wireless objects to this request for production on the grounds that such information is obtainable from a more convenient, less burdensome, and less expensive source. Consistent with its objections, Verizon Wireless responds as follows.

To the best of the recollection of both Mr. Jones and Mr. Cole, neither of them have written or co-written any articles, journals, or books. To the best of the recollection of both Mr. Jones and Mr. Cole, neither of them have written or co-written any speeches related to telecommunications issues. If it becomes necessary to supplement this response at a later time, Verizon Wireless will act accordingly.

15. Please produce any and all documentation, items, reports, data, communications, and evidence of any kind that Verizon Wireless intends to offer as evidence at the hearing or to refer to in any way at the hearing.

RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product. To the extent this request seeks documents prepared in anticipation of litigation or for hearing and not generally discoverable, Verizon Wireless objects to this request on the grounds that the requesting party has not demonstrated a substantial need of the materials in the preparation of the case. Further, under the Telecommunications Act of 1996 and the FCC's rules and orders, the Coalition has the evidentiary burden in this matter, not any opposing party. Verizon Wireless also objects to this request on the grounds that it is overly broad, vague, and unduly burdensome. Without waiving its objections, Verizon Wireless responds as follows.

Verizon Wireless has not completed its preparations for the hearing in this matter. Therefore, Verizon Wireless has not yet compiled the items requested. The foregoing notwithstanding, at this time Verizon Wireless intends to rely upon various FCC notices, orders, rules, and the like related to number portability and interconnection, the Telecommunications Act of 1996, the discovery responses filed in this matter, all pre-filed testimony to be submitted in this matter and any attachments or exhibits thereto, Verizon Wireless' bona fide requests to Coalition members and any responses thereto, and any documents filed in TRA Docket No. 03-00633.

With respect to the foregoing responses, Verizon Wireless objects to this request for production on the grounds that such information is obtainable from a more convenient, less burdensome, and less expensive source.

See also Verizon Wireless responses to Request Nos. 2 and 9.

16. Please produce all documents that refer or relate to the subject matter of your responses to Request Nos. 1 - 7.

RESPONSE: Verizon Wireless objects to this request to the extent that the request seeks information that constitutes attorney work-product and/or is subject to the attorney-client privilege. Verizon Wireless also objects to this request on the grounds that it is overly broad, vague and unduly burdensome. Further, to the extent this request seeks generally non-discoverable documents prepared in anticipation of litigation or for hearing, Verizon Wireless objects to this request on the grounds that the requesting party has not demonstrated a substantial need of the materials in the preparation of the case. Moreover, under the Telecommunications Act of 1996 and the FCC's rules and orders, the Coalition has the evidentiary burden in this matter, not any opposing party. Without waiving its objections, Verizon Wireless responds as follows.

See Verizon Wireless' responses to Request Nos. 2 and 9.

17. Please identify by name, address, employer, and current telephone number, all persons having knowledge of the subject matter of your responses to Request Nos. 1 -7.

RESPONSE: Verizon Wireless objects to this request on the grounds that it is overly broad and unduly burdensome. Verizon Wireless further objects in reliance on the

attorney-client privilege. Without waiving its objections, Verizon Wireless responds as follows.

Verizon Wireless has not completed its preparations for the hearing in this matter. At this time, other than attorneys, Verizon Wireless responds as follows: Chris Jones; Greg Cole; and Linda Godfrey. Other information on Mr. Jones and Mr. Cole is provided in response to Request No. 8. Linda Godfrey is an employee of Verizon Wireless in Walnut Creek, California, where she is employed in Network Operations, as a Member of Technical Services. If it becomes necessary to supplement this request at a later time, Verizon Wireless will act accordingly.

18. Please list all witnesses you expect will provide testimony at the hearing of this matter, including their name, address, and a summary of the scope of their testimony.

RESPONSE: Verizon Wireless has not completed its preparations for the hearing in this matter. Though subject to change, at this time the following persons are expected to provide testimony in this matter: Chris Jones and Greg Cole. The addresses of the foregoing persons are contained in the responses to Request No. 8 above. As for a summary of the scope of their testimony, Verizon Wireless objects to this request on the grounds that it is unreasonably cumulative or duplicative and/or is obtainable from the responses to Request No. 8 above and from the soon to be submitted Pre-filed testimony.

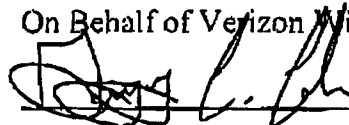
OATH

STATE OF North Carolina)
COUNTY OF Mecklenburg)

I, Gregory C. Cole, on behalf of Verizon Wireless, being first duly sworn according to law, make oath that the preceding answers and responses to the Discovery Requests submitted by the Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives are true, accurate and correct to the best of my knowledge, information and belief.

On Behalf of Verizon Wireless

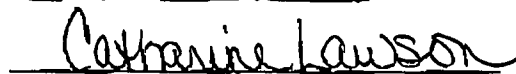
By:



Its: South Area - Transport Planning Manager

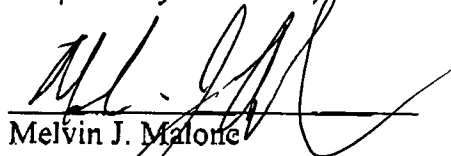
Sworn to and subscribed before me this 27th day of May, 2004.

**NOTARY PUBLIC
STATE OF NORTH CAROLINA
CABARRUS COUNTY
CATHARINE LAWSON
MY COMMISSION EXPIRES
JANUARY 4, 2005**


Notary Public

My Commission Expires: _____

Respectfully submitted,



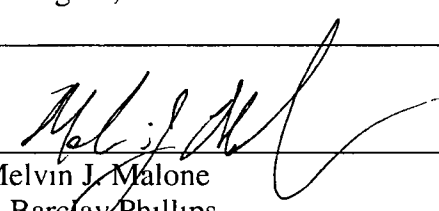
Melvin J. Malone
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Miller & Martin, PLLC
1200 One Nashville Place
150 Fourth Avenue North
Nashville, TN 37219-2433
(615) 244-9270

Counsel for Celco Partnership d/b/a
Verizon Wireless

CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2004, a true and correct copy of the foregoing has been served on the parties of record, via the method indicated

<input checked="" type="checkbox"/> Hand <input type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight <input checked="" type="checkbox"/> Electronically	Dale Grimes Tara Swafford Bass, Berry & Sims 315 Deaderick Street, Suite 2700 Nashville, TN 37238-3001
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight <input type="checkbox"/> Electronically	Thomas J. Moorman Stephen G. Kraskin Kraskin, Lesse & Cosson, LLP 2120 L Street NW, Suite 520 Washington, D.C. 20037
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight <input checked="" type="checkbox"/> Electronically	Timothy Phillips Office of the Attorney General Consumer Advocate and Protection Division 425 5 th Avenue North Nashville, TN 37202
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight <input checked="" type="checkbox"/> Electronically	Edward Phillips Sprint 14111 Capital Boulevard Wake Forest, NC 27587 (courtesy copy)
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight <input checked="" type="checkbox"/> Electronically	Ann Hoskins Lolita Forbes Verizon Wireless Legal & External Affairs Department 1300 I Street, N.W., Suite 400 West Washington, D.C. 20005



Melvin J. Malone
J. Barclay Phillips
Miller & Martin, PLLC